

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No. 1:23-cv-00108-LMB-JFA

**OBJECTIONS TO PLAINTIFFS’ COUNTER DEPOSITION TESTIMONY  
DESIGNATIONS AND GOOGLE’S “FAIRNESS” DESIGNATIONS**

Pursuant to the Court’s Order Regarding Pre-Trial Schedule and Procedures entered on August 5, 2025, ECF No. 1560, Rule 26(a)(3) of the Federal Rules of Civil Procedure, and Local Civil Rule 30, Defendant Google LLC (“Google”) hereby submits its objections and “fairness” designations to Plaintiffs’ counter deposition designations, dated August 29, 2025. *See* ECF No. 1576. The objection codes are as follows:

Code	Objection
104a	Foundation
106	Incomplete excerpt
402	Relevance
602	Calls for speculation; speculative; lack of personal knowledge
611b	Outside the scope of direct examination
611c	Leading
701	Improper opinion by lay witness
802	Hearsay

Google reserves the right to amend and/or supplement the attached objections and fairness designations, including with respect to the Court's rulings on motions *in limine* or other pre-trial rulings, as well as in the event a witness whom Google intends to call live is unable to testify live and may only appear by deposition. Google also reserves the right to introduce or use any of Plaintiffs' designations at trial, including as counter-designations, to the extent Plaintiffs do not do so. Google further incorporates by reference herein its deposition designations, objections to Plaintiffs' designations, and counter designations as filed on August 22, 2025 and August 29, 2025, respectively. *See* ECF No. 1569; ECF No. 1577.

Dated: September 3, 2025

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**Google's Objections to Plaintiffs' Counter  
Designations and Fairness Designations**

**Michael Racic (Prebid)**

<b>Witness</b>	<b>Depo. Date</b>	<b>Plaintiffs' Counter Designations</b>	<b>Third-Party Confidentiality as of August 29, 2025</b>	<b>Google Objections</b>	<b>Google Fairness Designations</b>
Michael Racic	2025.07.28	163:2-5; 163:8-164:1; 164:3- 164:13	Public		

**Google's Objections to Plaintiffs' Counter Designations and Fairness Designations**

**Rajeev Goel (PubMatic)**

<b>Witness</b>	<b>Depo. Date</b>	<b>Plaintiffs' Counter Designations</b>	<b>Third-Party Confidentiality as of August 29, 2025</b>	<b>Google Objections</b>	<b>Google Fairness Designations</b>
Rajeev Goel	2025.08.20	216:9-217:16; 217:17-217:21; 217:23-218:11; 218:13-218:16; 218:17-218:24	Highly Confidential	402, 611b (217:2-21); 402, 611b (217:23-218:11); 402, 611b (218:13-16); 402, 611b (218:17-24)	
Rajeev Goel	2025.08.20	221:15-222:8; 222:17-222:19; 222:21	Highly Confidential	602, 611c, 701 (222:17-19); 602, 611c, 702 (222:21)	
Rajeev Goel	2025.08.20	213:14-214:12; 225:6-225:8; 225:10-225:13; 225:15	Highly Confidential	602, 701, 802 (213:14-214:12); 602, 611c, 701 (225:6-8); 602, 611c, 701 (225:10-13); 106, 602, 701 (225:15)	214:13-215:2; 215:4-10
Rajeev Goel	2025.08.20	228:23-228:24; 229:1-229:26	Highly Confidential	104a, 602, 701 (228:23-24); 104a, 602, 701 (229:1-6)	